

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 22-cr-20209-KMM

UNITED STATES OF AMERICA

v.

RICARDO RODRIGUEZ-OTERO,

Defendant.

**RESPONSE TO RICARDO RODRIGUEZ-OTERO'S
MOTION FOR WORK RELEASE**

The United States of America ("United States" or "Government") files this Response to Defendant Ricardo Rodriguez-Otero's ("Defendant") Motion for Work Release filed April 14, 2025 (ECF No. 49) ("Motion"). The Government does not oppose the relief requested in the Motion. In addition, undersigned counsel conferred with the U.S. Probation Office ("Probation") regarding the Motion and represents that Probation does not object to the relief sought.

Defendant was arrested and made his initial appearance on June 1, 2022, pursuant to an Indictment charging him with three counts of distribution of cocaine in violation of 18 U.S.C. § 841(a)(1) (ECF Nos. 1,8). The Government moved for pretrial detention and a hearing was held on June 6, 2022 (ECF No. 9). U.S. Magistrate Judge Torres ordered a \$200,000 personal surety bond with home confinement. (ECF No. 10). On August 5, 2022, Defendant moved to modify the conditions of his release to allow him to work at Joyeria Giovanni while on bond. (ECF No. 20). The Government and Probation ultimately did not object to the request and Defendant's conditions were modified. (ECF Nos. 22 and 23). Defendant later pled guilty to drug charges and was sentenced to five years imprisonment. (ECF Nos. 27 and 39).

In his Motion, Defendant requests authorization to again work at Joyeria Jovanni while at a halfway house under the supervision of the Bureau of Prisons. Motion at 1-2. Undersigned counsel and Probation do not oppose the relief sought in the Motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Undersigned counsel certifies that a copy of this response is being mailed to Defendant at the following address:

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